

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE: REALPAGE, INC., RENTAL)	No. 3:23-cv-03071
SOFTWARE ANTITRUST)	MDL No. 3071
LITIGATION (NO. II))	
)	THIS DOCUMENT RELATES TO:
)	
)	ALL CASES

**DEFENDANT KNIGHTVEST RESIDENTIAL’S UNOPPOSED MOTION
TO EXTEND THE STRUCTURED DATA PRODUCTION DEADLINE**

Defendant Knightvest Residential (“Knightvest”) submits this Unopposed Motion to Extend the Structured Data Production Deadline currently set for December 20, 2024, to January 15, 2025, as to Knightvest only. The modification is supported by good cause and complies with Local Rule 16.01(h)(1). Plaintiffs are unopposed to the relief requested in this motion.

I. Background

1. The Court’s Case Management Order (“CMO”) and subsequent docket entry (Dkt. 1005) modifying the CMO established the current deadline for structured data production as December 20, 2024.
2. Knightvest has produced a sample of its structured data to Plaintiffs.
3. Knightvest does not have a dedicated IT department and relies on a small number of employees who have been tasked with pulling the relevant responsive structured data. These individuals are doing so in addition to their primary responsibilities in their regular roles at Knightvest.
4. Knightvest is engaged in active settlement discussions with the plaintiff class. As a part of these discussions, Knightvest has provided data and information to Plaintiffs under Rule

408 and is continuing to gather and compile additional data and information to facilitate and advance the settlement process. This effort is being undertaken by the same personnel responsible for preparing the structured data.

II. Good Cause Exists and No Prejudice to any Party

5. Knightvest's request is made in good faith and to facilitate settlement discussions.

6. If Knightvest shifted its focus to meeting the current deadline for producing structured data, its ability to compile and continue compiling and providing data and information critical to the ongoing settlement discussions would have been and will be negatively impacted, as its recent efforts and resources have been and continue to be directed toward compiling and providing data under Federal Rule of Evidence 408 to support and advance said negotiations. Granting this Motion aligns with Rule 16(b)(4)'s "good cause" standard, as Knightvest's pursuance of settlement efforts impacted its inability to meet the current deadline and continue to do so.

7. Extending the deadline to January 15, 2025, will enable Knightvest to maintain its focus on settlement efforts, thereby supporting the parties' shared goal of reaching a resolution.

8. Plaintiffs are unopposed to the requested extension; the affected parties will not suffer prejudice from this extension.

9. No other CMO deadlines will be impacted upon a granting of this motion.

III. Compliance with Local Rule 16.01(h)(1)

Local Rule 16.01(h)(1) requires that no dispositive motion deadline shall be later than 90 days in advance of the trial date; the CMO requires that a motion to modify the CMO include a statement that the requested modification maintains conformity to said requirement. (Dkt. 818 at 1.). Pursuant to same, Knightvest states that an extension of the structured data deadline to January 15, 2025, as to Knightvest does not impact the

current dispositive motion deadlines, and accordingly complies with Local Rule 16.01(h)(1).

IV. Conclusion

For the foregoing reasons, Knightvest respectfully requests that the Court extend Knightvest's deadline for production of structured data from December 20, 2024, to January 15, 2025.

Dated: December 20, 2024

Respectfully submitted,

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ATTORNEYS FOR KNIGHTVEST
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *DEFENDANT KNIGHTVEST RESIDENTIAL'S UNOPPOSED MOTION TO EXTEND THE STRUCTURED DATA PRODUCTION DEADLINE* was served electronically on the plaintiffs' counsel of record by the listserv (RealPageCoCounsel@scott-scott.com) on December 20, 2024.

By: /s/ Chelsea L. Futrell
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